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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA)	CASE NO. CR-12-0799 YGR
)	
v.)	STIPULATED REQUEST TO CONTINUE
)	STATUS HEARING TO JUNE 24, 2014 AT 11:00
DANIEL RAMOS,)	A.M.
)	
Defendant.)	Date: June 24, 2014
)	Time: 11:00 A.M.
)	
)	

The above-captioned matter is set on June 5, 2014 at 3:00 p.m. before this Court for a status hearing. The government has produced a significant amount of discovery to defense counsel for this case, and defense counsel is reviewing the discovery and conducting further investigation in the case. Further, counsel for the government and defendant are actively trying to resolve this case in which defendant faces the possibility of substantial mandatory minimum penalties. Therefore, for all of these reasons, both counsel for the government and defendant request that the status hearing previously scheduled for June 5, 2014 be continued to June 24, 2014 at 11:00 a.m. in order to give defense counsel time to conduct investigation into this case and to give counsel for both sides time to conduct plea negotiations.

The Court has previously excluded the running of the speedy trial clock for effective preparation

of counsel, 18 U.S.C. § 3161(h)(7)(B)(iv), through June 5, 2014. Therefore, the parties now request that the time between June 5, 2014 and June 24, 2014 be excluded from the running of the speedy trial clock for that same reason – effective preparation of counsel, 18 U.S.C. § 3161(h)(7)(B)(iv). The parties agree that, taking into account the public interest in prompt disposition of criminal cases, good cause exists for this continuance. The parties also agree that the ends of justice served by granting such a continuance outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).

SO STIPULATED:

MELINDA HAAG
United States Attorney

DATED: June 4, 2014

/s/
NATALIE LEE
Assistant United States Attorney

DATED: June 4, 2014

/s/
LAUREL L. HEADLEY
Attorney for Daniel Ramos

For the reasons stated above, the status hearing in this matter is continued until June 24, 2014 at 11:00 a.m. The Court finds that the exclusion of time from June 5, 2014 through June 24, 2014 is warranted and that the ends of justice served by the continuance outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161 (h)(7)(A). The failure to grant the requested continuance would deny the defendant effective preparation of counsel. 18 U.S.C. § 3161(h)(7)(B)(iv).
SO ORDERED.

DATED: June 5, 2014 _____


HONORABLE YVONNE GONZALEZ ROGERS
United States District Judge